

To the Honorable Commissioners of the FCC,

I am writing to you today to comment on Docket No. 02-277, The Biennial Review of the FCC's broadcast media ownership rules. I am shocked that the FCC is considering such a sweeping and important change like this in such a seemingly quiet manner. The fact that this move has been so relatively underreported in the mainstream media controlled by increasingly fewer large corporations is a telling commentary on both the level of control they already have and the fact that they (and, apparently, three FCC commissioners) prefer to try to move this quietly. Which, I think, makes the level of opposition you will see to this underreported move all the more remarkable.

I am voicing my support to retain all the FCC rules in question. These rules set limits on concentration of the broadcast industry and serve the public interest by preserving diversity of ownership in the broadcast marketplace. These rules are; The Television-Radio Cross-Ownership Rule, The Broadcast-Newspaper Cross Ownership Ban, The National Television Ownership Rule, The Duopoly Rule for Radio, The Local Television Ownership Rule, and The Dual Network Rule.

The great privilege to carry on informed debate and discussion of current events, both locally and globally, is part of the founding philosophy of this country. If the avenues for sharing information are restricted to very few, then I fear that the quality of the information presented will decay. What is the value of varied information sources when they are controlled by a single voice?

While there have been some technological changes that have opened some more channels on some media like cable TV - at least in theory - the level of change, in my view, doesn't come close to justifying changes that greatly weaken the rules guarding against media concentration that are so important for a functioning democracy.

Newspapers, for example, are still very expensive to start up. Anyone wanting to go head to head with the Cox family's Atlanta daily papers would need lots of patience and hundreds of millions of dollars. Cox will claim they have competition from niche players, but it's not the same as true head-to-head competition, and they know it. And it shows in their complacent, mediocre papers that have consistently underperformed on recognition for journalistic achievements (given their size and the resources at their disposal). Arguably the papers instead are comfortable cash cows for financing acquisitions of other media outlets.

Radio is truly bad now with companies like Clear Channel already controlling too much and turning out bland, cookie-cutter stations that play the same limited playlists (Oldies stations have reduced the Beatles to 10 songs!). Programming and other decisions are no longer made at local levels, employment is down and the only beneficiaries are the large corporate owners that occupy chunks of scarce spectrum and shut out diversity. They know that if they gobble up enough stations, the choice will be between listening to them or not listening at all, and when it comes to that point (as it already has for me), the FCC has failed to do its job.

Even cable and satellite TV - touted as the great frontier for diversity - isn't turning out that way. For one thing, it's too

expensive and the FCC needs to look out for Americans other than those who can afford to fork out \$50 a month for 100 or 150 channels (many people still DO watch only broadcast TV!) And for another thing, those channels are aggressively sought by the same corporations that want to quietly dominate the media. MTV, ESPN, CNN and other basic channels have multiplied to take up the extra capacity (ESPN2, MTV2, CNN2, etc.). And in case anyone still can do a successful independent cable network start-up, the large companies are waiting in the wings to either buy the offending channel, keep it off their own cable systems, or, if the independent owner won't sell, to launch a copycat channel and use their mismatched resources to crush the competitor (like Microsoft vs. Netscape, transferred to media).

In such an environment, the commercial interest inevitably compromises the public interest. The FCC has rules limiting ownership to preserve the ecology of a healthy marketplace of ideas. If the FCC undermines this ecology by removing the rules, it undermines the future health of the marketplace of information.

Congress and the Supreme Court have long recognized that a functioning democracy depends on a media open to independent and unconventional news and a varied entertainment media. Media makers working outside the corporate environment continually provide content that is so defined. This unconventionality and variety that stimulates the American people both causes us to constantly question the status quo, and facilitates the ability of Americans to speak with one another. If we exist in an environment in which our news outlets have merged together, both print and broadcast, our ability to open informed discussion is restricted.

I urge you to rule in the public interest on this matter. The public interest will be served by preserving the FCC's Broadcast Media ownership rules.

Thank you,

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